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Attorneys for Defendants

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

ESTATE OF SAOUN POL and J.P.,

Case No.: 2:21-cv-00788-WBS-AC

Plaintiffs,

vs.

CITY OF STOCKTON,

STIPULATION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT

[Local Rule 144(a)]

[No hearing required]

SUNTAG

This Stipulation is respectfully submitted by all named parties: Plaintiffs Estate of Saoun Pol, by and through real party in interest J.P. (both in his representative capacity, as successor in interest on behalf of the estate, and in his individual capacity, on his own behalf), on the one hand, and Defendants City of Stockton (also named as "Stockton Police Department") (the "City"), Chief of Police Eric Jones, Officer Jorge Andrade, and Officer Bradley Miller, on the other hand, all through their undersigned counsel of record.

RECITALS

- A. On May 3, 2021, Plaintiffs filed this lawsuit.
 - B. On or about May 5, 2021, Plaintiffs served process on the City and Officers Andrade and Miller.
 - C. Counsel for Defendants have only recently been retained to represent all named Defendants.
 - D. Counsel for Defendants represent they need additional time to review the Complaint and determine the appropriate response and prepare it.
 - E. Counsel for Defendants requested Plaintiffs' counsel grant them an extension of time of 28 days, and Plaintiffs' counsel is agreeable to that.
 - F. Counsel for Defendants will deem Chief Jones to have been served so that Plaintiff need not serve him.

STIPULATION

IT IS STIPULATED AND AGREED, by the parties, through their counsel of record that Defendants have an extension of time, through and including June 23,

1 2021, to move, plead, or otherwise respond to the Complaint, and Plaintiffs need not
2 serve process on Chief Jones.

3 Dated: May 25, 2021

4 HERUM CRABTREE SUNTAG
5 A California Professional Corporation

6 By: /s) Dana A. Suntag
7 DANA A. SUNTAG
8 Attorneys for all Defendants

9 Dated May 25, 2021

10 LAW OFFICE OF MARK E. MERIN

11 By: _____
12 MARK E. MERIN
13 PAUL H. MASUHARA
14 Attorneys for all Plaintiffs

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